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Illinois Primary Health Care Association
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April 16, 2012

Director Julie Hamos
Department of Healthcare and Family Services
Attn: Bureau of Program and Reimbursement Analysis
Division of Medical Programs
201 South Grand Avenue East
Springfield, Illinois 62763

RECEIVED

APR 23 2012

H.F.S.
DIRECTOR
SPRINGFIELD

RE: Cook County Health and Hospital System (CCHHS) Medicaid 1115 Waiver Request

Dear Director Hamos:

The Illinois Primary Health Care Association (IPHCA) would like to thank you for the opportunity to comment on the 1115 waiver submitted on behalf of the CCHHS. As you know, IPHCA represents Illinois' Federally Qualified Health Centers (FQHC's). As providers of primary and preventive care to a large number of individuals within the Cook County safety-net system, we applaud the County's efforts to cover the current uninsured population that will become eligible for Medicaid in 2014.

Giving CCHHS a head start on enrolling this population will not only relieve some of the financial pressures on the County budget, but will also encourage the coordination of care for these individuals, leading to better health outcomes and cost efficiencies. As the proposal states, "The uninsured need access to well-functioning medical homes that focus on prevention, early detection of illness and coordinated comprehensive management of chronic diseases."

In order to meet cost neutrality associated with an 1115 waiver, CCHHS must ensure network adequacy to realize the cost savings associated with a medical home model. However, as CCHHS develops its network of community partners, it is crucial that any willing FQHC that serves residents of Cook County be given the opportunity to participate, ensuring their patients – both the waiver population and uninsured – continue to have access to specialty services, diagnostics and inpatient care.

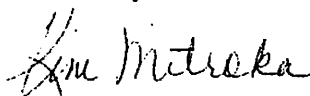
Of further concern to our member health centers, is the lack of information included in the proposal regarding FQHC rates of reimbursement. The only mention in the document states, "Payment for community providers may be at a rate less than the Illinois Medicaid rate as some rates will need to be vetted and approved between community partners, CCHHS and HFS...". As you know, Congress included specific language in the Social Security Act that protects the integrity and original mission of the FQHC program by requiring states to ensure that health centers receive reimbursement equal to their Prospective Payment System (PPS) encounter rate for any Medicaid covered service.

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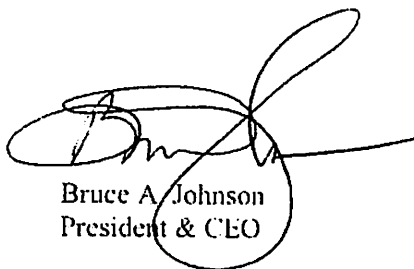
Serving the Medically Underserved Across Illinois for 30 Years

Provided that FQHC payments are addressed as prescribed under federal law in the final agreement with CMS, IPHCA supports the proposed waiver given our similar mission of providing high-quality, comprehensive care to underserved communities regardless of ability to pay.

Sincerely,



Kim Mitroka
Chair



Bruce A. Johnson
President & CEO

cc: Dr. Ram Raju, CEO, CCHHS
Dr. Bechara Choucair, Commissioner, CDPH